

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

ELVIS MOODIE, RAYON FISHER,)	
DESMOND ELLIS, and)	
KEISHA COLLINS-ENNIS, on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 2:15-cv-01097-RMG
Plaintiffs,)	
)	
v.)	
)	
KIAWAH ISLAND INN COMPANY, LLC,)	
d/b/a KIAWAH ISLAND GOLF RESORT,)	
)	
Defendant.)	
)	

DECLARATION OF MICHELLE LAPOINTE

1. I am a Senior Staff Attorney at the Southern Poverty Law Center (“SPLC”) and one of Plaintiffs’ attorneys (and Class Counsel) in this matter.
2. I am admitted to practice in the state courts of Georgia, the U.S. District Court for the Northern District of Georgia, and the United States Courts of Appeals for the Fourth, Fifth, Ninth, Eleventh, and District of Columbia Circuits. I earned my Juris Doctor Degree from the American University Washington College of Law, *magna cum laude*, and was awarded the Order of the Coif, in 2008. I was admitted to practice in Georgia that same year.
3. During my legal career, I have represented thousands of clients in class action and other complex litigation.
4. I am currently a Senior Staff Attorney at the Southern Poverty Law Center’s Immigrant Justice Project, where I have worked since September 2008. From September 2008 until September 2010, I served as a Law Fellow at SPLC. I became a Staff Attorney in September 2010 and a Senior Staff Attorney in 2014.

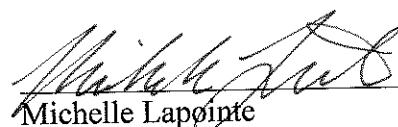
5. During the course of this litigation, I have kept contemporaneous time records related to my work on this case. Those time records are recorded in SPLC's computerized document management and timekeeping software during the normal course and scope of my work. My time records related to this case are attached to this Declaration as Exhibit A.

6. James Knoepp, who is the most senior attorney from SPLC assigned to this case, added fields to Exhibit A for my proposed rate, the total lodestar for each entry, and the notes field. Mr. Knoepp, in his role as lead attorney from SPLC on this case, has reviewed my time records and eliminated certain entries in the exercise of billing judgment. Those reductions in the lodestar associated with my work on the case are reflected in the attached Exhibit A, both in the "Total" field and the "Notes" field for each row.

7. My office filed an attorneys' fees petition in *Nunag-Tanedo v. E. Baton Rouge Parish Sch. Bd.*, Case No. 8:10-cv-01172-JAK-MLG. That case was pending before the United States District Court for the Central District of California in Los Angeles. In 2013 the court awarded attorneys' fees to the plaintiffs and based the award on a rate of \$350 per hour for my work on the case.

8. Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I declare that the foregoing facts are true and correct to the best of my knowledge.

Dated: December 2, 2016



Michelle Lapointe

Date	Description	Staff	Hourly Rate	Proposed Amount	Notes
12/17/2015	Call with opposing counsel on payroll production issues and deposition scheduling	Lapointe	0.7	\$0.00	\$0.00 Eliminated in the exercise of billing judgment
12/18/2015	Conference call with opposing counsel re: discovery issues	Lapointe	0.5	\$0.00	\$0.00 Eliminated in the exercise of billing judgment
1/28/2016	Second-chaired deposition of J. Hobbs (FLECTS)	Lapointe	1.5	\$0.00	\$0.00 Eliminated in the exercise of billing judgment
1/28/2016	Second-chaired deposition of Perry Wells (FLECTS)	Lapointe	3	\$0.00	\$0.00 Eliminated in the exercise of billing judgment
3/4/2015	Prepare PHV application and motion	Lapointe	0.6	\$0.00	\$0.00 Eliminated in the exercise of billing judgment
5/5/2015	Participate in Rule 26(f) conference	Lapointe	0.8	\$0.00	\$0.00 Eliminated in the exercise of billing judgment
5/5/2015	Prepare for Rule 26(f) conference	Lapointe	0.5	\$0.00	\$0.00 Eliminated in the exercise of billing judgment
5/5/2015	Meeting with Jim Kneopp to discuss Rule 26(f) conference	Lapointe	0.7	\$0.00	\$0.00 Eliminated in the exercise of billing judgment
12/14/2015	Second-chaired deposition of J. Simpson	Lapointe	5.2	\$0.00	\$0.00 Eliminated in the exercise of billing judgment
1/11/2016	Participate in Karla Bujak deposition	Lapointe	5.8	\$0.00	\$0.00 Eliminated in the exercise of billing judgment
2/27/2015	Call with SR, JK, Nancy Bloodgood re: co-counseling	Lapointe	0.3	\$375.00	\$112.50
3/5/2015	Reviewed and edited draft complaint	Lapointe	2.4	\$375.00	\$900.00
3/4/2015	Discussions with Jim on SOI for Ks in SC, research on arising under federal statute language	Lapointe	1.2	\$375.00	\$450.00
3/4/2015	Research on SCPWA and SOL on K claims in SC	Lapointe	1.3	\$375.00	\$487.50
3/5/2015	Discussions with Sarah and Jim on SCPWA	Lapointe	0.3	\$375.00	\$112.50
3/5/2015	Additional review of and edits to draft of Kiawah complaint	Lapointe	1	\$375.00	\$375.00
3/6/2015	Meeting with Jim Kneopp to discuss final changes; legal research on SCPWA	Lapointe	0.8	\$375.00	\$300.00
3/9/2015	Team meeting to plan next steps including filing of R, 23 and collective action motions, service, client issues	Lapointe	0.6	\$375.00	\$225.00
3/18/2015	Review and edit memo of law ISO collective action cert motion	Lapointe	1	\$375.00	\$375.00
3/27/2015	Conference call with Keisha Collins-Emus re next steps in lawsuit	Lapointe	0.3	\$375.00	\$112.50
3/27/2015	Conference call with SR, CM and el Desmond Ellis to discuss serving process on Kiawah and next steps in case	Lapointe	0.3	\$375.00	\$112.50
3/27/2015	Conference call with SR, DP, CM and client Rayon Fisher to discuss next steps in case including service of cmpl and possible discovery	Lapointe	0.4	\$375.00	\$150.00
3/9/2015	Review and edit next steps including filing of R, 23 and collective action motions, service, client issues	Lapointe	0.6	\$375.00	\$225.00
4/1/2015	Review and edit collective action cert motion	Lapointe	1.2	\$375.00	\$450.00
4/7/2015	Edited memo in support of R, 23 motion	Lapointe	0.3	\$375.00	\$112.50
4/8/2015	Entails with Meredith Stewart re SPWID	Lapointe	1	\$375.00	\$375.00
4/22/2015	Review Kiawah's motion to dismiss	Lapointe	0.5	\$375.00	\$187.50
4/27/2015	Discuss Kiawah outreach with Carmen and Emily	Lapointe	0.5	\$375.00	\$187.50
4/29/2015	Meet with Jim Kneopp and Meredith Stewart to discuss legal arguments in response to MTD	Lapointe	5	\$375.00	\$1,875.00
5/4/2015	Draft response to Kiawah's MTD	Lapointe	11	\$375.00	\$4,125.00
5/6/2015	5 draft response to MTD	Lapointe	6	\$375.00	\$2,250.00
5/7/2015	Draft response to MTD	Lapointe	5.25	\$375.00	\$1,968.75
5/8/2015	Edits and additions to opposition to Kiawah's MTD	Lapointe	0.6	\$375.00	\$225.00
5/11/2015	Review Kiawah outreach memo and comment on same	Lapointe	0.3	\$375.00	\$112.50
5/18/2015	Review defendant's opposition to Rule 23 class certification	Lapointe	0.2	\$375.00	\$75.00
5/18/2015	Call with Cherie Blackburn re motion to stay and Rule 26(f) report	Lapointe	0.3	\$375.00	\$112.50
5/19/2015	Discuss Kiawah's Rule 23 opposition with Jim	Lapointe	0.2	\$375.00	\$75.00
5/19/2015	Researching and drafting reply in support of Rule 23 motion	Lapointe	0.3	\$375.00	\$1,162.50
5/20/2015	Drafting reply in support of Rule 23 motion and FLSA collective action	Lapointe	4.3	\$375.00	\$1,612.50
5/21/2015	Prepare Rule 26(f) report, amended scheduling order, mediation form	Lapointe	3.08	\$375.00	\$1,155.00
5/21/2015	Drafting reply in support of Rule 23 motion and FLSA collective action certification	Lapointe	0.3	\$375.00	\$75.00
5/21/2015	Drafting reply in support of Rule 23 motion and FLSA collective action	Lapointe	2.58	\$375.00	\$967.50
5/24/2015	Edits to 26(f) report and local rule 26(3) report	Lapointe	0.8	\$375.00	\$300.00
5/27/2015	Emails with Carmen Martinez re FLSA opt-in forms, 26(f) report	Lapointe	0.2	\$375.00	\$75.00
5/27/2015	Call with Molly Cherry re 26(f) report	Lapointe	0.2	\$375.00	\$75.00
5/27/2015	Call with Nancy Bloodgood re 26(f) report	Lapointe	0.2	\$375.00	\$75.00
6/3/2015	Drafted response in opposition to motion to stay ruling on FLSA and Rule 23 motions	Lapointe	4.3	\$375.00	\$1,612.50
6/17/2015	Prepared subpoena and attachment to FLECTS	Lapointe	0.5	\$375.00	\$187.50
6/18/2015	Prepared subpoena and attachment to FLECTS	Lapointe	0.5	\$375.00	\$187.50
6/19/2015	Edits to FLECTS subpoena	Lapointe	0.7	\$375.00	\$262.50
6/23/2015	Drafted interrogatories to Kiawah	Lapointe	0.3	\$375.00	\$112.50
6/23/2015	Drafted seventh notice of filing FLSA consent, sent to local counsel for filing	Lapointe	0.5	\$375.00	\$187.50
6/23/2015	Drafted first requests for production to Kiawah	Lapointe	2.5	\$375.00	\$937.50
6/24/2015	Revise RPPs to Kiawah per Jim's suggestions	Lapointe	0.5	\$375.00	\$187.50
6/25/2015	Drafted subpoena to the Graybill LP, owner of Gardens at Ashley River apartment complex	Lapointe	0.7	\$375.00	\$262.50
6/29/2015	Drafted eighth notice of filing of FLSA consent; sent to local counsel for filing	Lapointe	0.3	\$375.00	\$112.50
6/29/2015	Emailed and discussed with Carmen Martinez re: opt-in pay issue	Lapointe	0.2	\$375.00	\$75.00

PLAINTIFF'S EXHIBIT

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Date	Description	Staff	Dir Qty	Proposed Rate	Amount	Note
7/2/2015	Finalized and served rogs and RFPs	Lapointe	2.25	\$375.00	\$843.75	
7/14/2015	Revised subpoena to Gardens at Ashley River	Lapointe	0.5	\$375.00	\$187.50	
7/22/2015	Meeting with Sarah Rich to discuss status of case and plan for discovery responses	Lapointe	0.4	\$375.00	\$150.00	
7/22/2015	Discuss document production issues with Sarah and Jim	Lapointe	0.3	\$375.00	\$112.50	
7/23/2015	Emailed court with FLSA opt-in notice proposed by Plaintiffs	Lapointe	0.2	\$375.00	\$75.00	
7/23/2015	Emailed opposing counsel re FLSA opt-in notice to be sent to court	Lapointe	0.2	\$375.00	\$75.00	
7/24/2015	Discusses with Carmen and Sarah responding to Kiawah discovery served on Plaintiffs	Lapointe	0.2	\$375.00	\$75.00	
7/27/2015	Reviewed order granting FLSA collective certification	Lapointe	0.2	\$375.00	\$75.00	
7/29/2015	Drafted interrogatory responses template	Lapointe	0.2	\$375.00	\$75.00	
7/31/2015	Reviewed Defendant's proposed confidentiality order	Lapointe	0.2	\$375.00	\$75.00	
8/3/2015	Emails with SR and JK re JCL/O's role	Lapointe	0.2	\$375.00	\$75.00	
8/3/2015	Review and edit letter drafted by FLECTS attorney re subpoena response	Lapointe	0.2	\$375.00	\$75.00	
8/3/2015	Spoke with Elvis to discuss settling up apt for rogs/RFP responses and to discuss FLSA certification and posting of notice	Lapointe	0.2	\$375.00	\$75.00	
8/4/2015	Emails with Sarah Rich re: objections to rogs and RFPs	Lapointe	0.2	\$375.00	\$75.00	
8/4/2015	Discussed with Sarah Rich order on MTD	Lapointe	0.2	\$375.00	\$75.00	
8/4/2015	Reviewed order on motion to dismiss	Lapointe	0.2	\$375.00	\$75.00	
8/5/2015	Discussed with Sarah and Jim the SCPWA and deductions for return travel	Lapointe	0.3	\$375.00	\$112.50	
8/6/2015	Review of and edits to JCL/O subpoena	Lapointe	0.2	\$375.00	\$75.00	
8/6/2015	Call with Elvis Moodie, updated on MTD win and rescheduled rogs call	Lapointe	0.1	\$375.00	\$37.50	
8/7/2015	Call with Elvis to review interrogatory responses	Lapointe	2.1	\$375.00	\$787.50	
8/7/2015	Review letter drafted by Sarah re 2015 transportation deductions	Lapointe	0.1	\$375.00	\$37.50	
8/10/2015	Meeting with Sarah Rich, Becky Candler, Carmen Martinez re discovery response plan	Lapointe	0.5	\$375.00	\$187.50	
8/14/2015	Call with Nelson Chandler, attorney for sp1 complex, re subpoena response and extension request	Lapointe	0.2	\$375.00	\$75.00	
8/14/2015	Discussion with Sarah re proposed consent amended scheduling order	Lapointe	0.1	\$375.00	\$37.50	
8/14/2015	E-mailed notice of right to opt-in to lawsuit to workers	Lapointe	0.1	\$375.00	\$37.50	
8/18/2015	Discussion with Jim re redacting documents in Xera and mechanics of production	Lapointe	0.2	\$375.00	\$75.00	
8/18/2015	Discussion with Sarah re damages under breach of contract claim	Lapointe	0.1	\$375.00	\$37.50	
8/18/2015	Discussion with Jim about damages interrogatory	Lapointe	0.2	\$375.00	\$75.00	
8/18/2015	Call with Nelson Chandler re subpoena to apartment complex, content of documents and method of production	Lapointe	0.2	\$375.00	\$75.00	
8/18/2015	Call with Carmen and Sarah re damages theories	Lapointe	0.2	\$375.00	\$75.00	
8/20/2015	Prepared Elvis Moodie's responses to interrogatories	Lapointe	0.58	\$375.00	\$225.00	
8/19/2015	Review Sarah's edits to interrogatory response template	Lapointe	0.2	\$375.00	\$75.00	
8/19/2015	Meeting with Sarah, Carmen, Jim, to discuss discovery plan	Lapointe	0.8	\$375.00	\$300.00	
8/19/2015	Discussion with Carmen re plan for finalizing rogs responses	Lapointe	0.2	\$375.00	\$75.00	
8/19/2015	Discussion with Sarah re damages theories	Lapointe	0.2	\$375.00	\$75.00	
8/20/2015	Update draft of Desmond Ellis rogs responses	Lapointe	0.58	\$375.00	\$217.50	
8/20/2015	Update draft of Keisha Collins Ennis rogs responses	Lapointe	0.7	\$375.00	\$262.50	
8/20/2015	Incorporated edits to Elvis Moodie's interrogatory responses following conversation with him	Lapointe	1.7	\$375.00	\$637.50	
8/20/2015	Edit Rayon Fisher interrogatory responses drafted by Carmen	Lapointe	0.5	\$375.00	\$187.50	
8/20/2015	Edit with Carmen re downloading Elvis' paystubs from Kiawah system and uploading to Xera	Lapointe	1.3	\$375.00	\$487.50	
8/21/2015	Various e-mails with Carmen, admin re downloading Elvis' rogs responses for Desmond and Rayon, documents	Lapointe	0.2	\$375.00	\$75.00	
8/21/2015	Various emails with Carmen Martinez re finalizing rogs responses for Desmond and Rayon, documents	Lapointe	0.2	\$375.00	\$75.00	
8/21/2015	Send draft of rogs responses to co-counsel Nancy Bloodgood, request her feedback	Lapointe	0.83	\$375.00	\$311.25	
8/21/2015	Finalizing Elvis' Moodie rogs responses; writing letter to him re sending back sig page	Lapointe	1.53	\$375.00	\$573.75	
8/21/2015	Review Keisha Collins Ennis rogs responses with her and go over detail missing from first draft	Lapointe	0.1	\$375.00	\$37.50	
8/22/2015	Called Elvis re receipt of documents	Lapointe	1.3	\$375.00	\$487.50	
8/23/2015	Update Keisha's rogs responses and send to her for her signature	Lapointe	0.58	\$375.00	\$217.50	
8/24/2015	Edit Desmond rogs responses	Lapointe	0.4	\$375.00	\$150.00	
8/24/2015	Edit Rayon rogs responses	Lapointe	0.58	\$375.00	\$217.50	
8/24/2015	Called Keisha re whether she received documents	Lapointe	0.1	\$375.00	\$37.50	
8/24/2015	Edit Desmond's rogs responses	Lapointe	0.7	\$375.00	\$262.50	
8/24/2015	Edited Rayon's rogs responses	Lapointe	0.8	\$375.00	\$300.00	
8/24/2015	Reviewed class cert decision and discussed with Jim	Lapointe	0.4	\$375.00	\$150.00	
8/25/2015	Drafted response letter to N. Chandler re Gardens at Ashley River subpoena response	Lapointe	0.5	\$375.00	\$187.50	
8/25/2015	Final edits to Desmond rogs responses	Lapointe	0.4	\$375.00	\$150.00	
8/25/2015	Final edits to Rayon rogs responses	Lapointe	0.3	\$375.00	\$112.50	
8/25/2015	Final edits to Keisha rogs responses	Lapointe	0.3	\$375.00	\$112.50	
8/25/2015	Final edits to Elvis rogs responses	Lapointe	0.3	\$375.00	\$112.50	

Date	Description	Staff	billable Rate	Proposed Amount	Notes
8/25/2015	Multiple e-mails with Carmen, Sarah, Jim re Desmond's responsive documents	Lapointe	0.3	\$375.00	\$112.50
8/25/2015	Spoke with Keisha re small edits to log responses and signature	Lapointe	0.2	\$375.00	\$75.00
8/25/2015	Calendar deadlines from scheduling order	Lapointe	0.3	\$375.00	\$112.50
8/26/2015	Additional review of Desmond log responses after edits from Sarah and comments from Carmen	Lapointe	0.2	\$375.00	\$75.00
8/26/2015	Additional review of Rayon log responses after edits from Sarah and comments from Carmen	Lapointe	0.2	\$375.00	\$75.00
8/26/2015	Various e-mails with Jim, Sarah, Carmen re responsiveness of Plaintiff documents	Lapointe	0.3	\$375.00	\$112.50
8/26/2015	Added Rayon log responses	Lapointe	0.2	\$375.00	\$75.00
8/26/2015	Reviewed and commented on draft RFP responses	Lapointe	0.2	\$375.00	\$75.00
8/26/2015	Added RFP responses to Elvis' Moodie's log responses	Lapointe	0.2	\$375.00	\$75.00
8/26/2015	Reviewed and commented on draft RFP responses	Lapointe	0.2	\$375.00	\$75.00
8/27/2015	Meeting with Sarah, Carmen, Jim to discuss upcoming discovery tasks	Lapointe	1	\$375.00	\$375.00
8/27/2015	Draft litigation task list	Lapointe	0.4	\$375.00	\$150.00
8/27/2015	Responded to Cherie Blackburn's email re subpoena production	Lapointe	0.1	\$375.00	\$37.50
8/27/2015	Meeting with Sarah, Carmen, and Jim re finalizing discovery responses for production	Lapointe	0.2	\$375.00	\$75.00
8/27/2015	Finalize and send responses to Defendants' first logs and RFPs via email and US mail	Lapointe	1.2	\$375.00	\$450.00
8/27/2015	Team meeting re coding documents (Sarah, Emily, Carmen, Jim)	Lapointe	1	\$375.00	\$375.00
8/31/2015	Prepare subpoena for documents to Brantley Properties, Inc. (including related searching for proper corporate entity for service and emails with Carmen)	Lapointe	0.7	\$375.00	\$262.50
8/31/2015	Draft list of issues for coding Klawah docs	Lapointe	0.2	\$375.00	\$37.50
9/8/2015	Reviewed complaint for places we need to amend, drafted email to opposing counsel re amendment	Lapointe	0.3	\$375.00	\$112.50
9/8/2015	Edited proposed class notice and opt-out form; referenced other class notices we did previously	Lapointe	0.9	\$375.00	\$337.50
9/9/2015	Drafted proposed first amended complaint including looking at OFLC data and personnel files for 2015	Lapointe	1.1	\$375.00	\$412.50
9/9/2015	Discuss proposed additions to first amended complaint with Jim	Lapointe	0.2	\$375.00	\$75.00
9/10/2015	Discuss with Jim contents of privilege log; Xera redactions/privilege coding	Lapointe	0.1	\$375.00	\$37.50
9/10/2015	Edits to first amended complaint	Lapointe	0.3	\$375.00	\$112.50
9/11/2015	Meeting with Sarah and Jim re document types and coding in Xera	Lapointe	0.5	\$375.00	\$187.50
9/11/2015	Draft privilege log for defendant's first set of interrogatories and RFPs (reviewing docs on Xera for privilege); send to Sarah and Jim with comments	Lapointe	1	\$375.00	\$375.00
9/14/2015	Finalized and served privilege log	Lapointe	0.2	\$375.00	\$75.00
9/16/2015	Review NHE, Inc., subpoena response and organize documents in Escalt	Lapointe	0.8	\$375.00	\$300.00
9/17/2015	Review NHE, Inc., subpoena response and organize documents in Escalt	Lapointe	1.1	\$375.00	\$412.50
9/17/2015	Reviewed new FLSA consents, made corrections to notice, emailed Sarah and Carmen with clarifying questions	Lapointe	0.3	\$375.00	\$112.50
9/17/2015	Review NHE, Inc., subpoena response and organize documents in Escalt	Lapointe	2.8	\$375.00	\$1,050.00
9/29/2015	Meeting with Sarah, Carmen, Jim re coding documents and outstanding discovery issues	Lapointe	1	\$375.00	\$375.00
10/2/2015	Telephonic meet and confer with opposing counsel re discovery disputes	Lapointe	0.8	\$375.00	\$300.00
10/2/2015	Prepared with SR for meeting with opposing counsel re discovery	Lapointe	0.3	\$375.00	\$112.50
10/5/2015	Discuss Klawah discovery disputes with Jim before sending final letter to opposing counsel	Lapointe	0.2	\$375.00	\$75.00
10/5/2015	Review, revise, send letter to opposing counsel re discovery disputes	Lapointe	0.8	\$375.00	\$300.00
10/8/2015	Emails with Cherie Blackburn re Cerdian and production of weekly payroll data	Lapointe	0.2	\$375.00	\$75.00
10/8/2015	Emails with Carmen re planned outreach to Klawah	Lapointe	0.2	\$375.00	\$75.00
10/8/2015	Prepare subpoena and attachment for SCANA-SCE&G	Lapointe	0.5	\$375.00	\$187.50
10/8/2015	Prepare subpoena and attachment for Cerdian	Lapointe	0.7	\$375.00	\$262.50
10/9/2015	Talk to Carmen about service of SCANA and Cerdian subpoenas	Lapointe	0.2	\$375.00	\$75.00
10/9/2015	Finalize and send to opposing counsel SCANA subpoena	Lapointe	0.2	\$375.00	\$75.00
10/9/2015	Finalize and send to opposing counsel Cerdian subpoena	Lapointe	0.3	\$375.00	\$112.50
10/12/2015	Spoke with SR re responding to letter from opposing counsel re discovery disputes	Lapointe	0.2	\$375.00	\$75.00
10/12/2015	Reviewed letter from opposing counsel re discovery disputes	Lapointe	0.1	\$375.00	\$37.50
10/13/2015	Discussed SCANA (SCE&G) subpoena response with SCANA rep	Lapointe	0.1	\$375.00	\$37.50
10/13/2015	Incorporated edits, finalized, sent letter to opposing counsel re discovery disputes	Lapointe	0.4	\$375.00	\$150.00
10/14/2015	Meeting with Sarah to discuss responsibility for drafting reply in support of motion to amend and stipulated facts for summary judgment motions	Lapointe	0.1	\$375.00	\$37.50
10/14/2015	Spoke with SR re responding to letter from opposing counsel re discovery disputes	Lapointe	1	\$375.00	\$375.00
10/14/2015	Reviewed letter from opposing counsel re discovery disputes	Lapointe	0.7	\$375.00	\$262.50
10/16/2015	Drafted letter to opposing counsel re discovery disputes	Lapointe	0.2	\$375.00	\$75.00
10/16/2015	Further reviewed edits, finalized, sent letter to opposing counsel re discovery disputes	Lapointe	0.1	\$375.00	\$37.50
10/16/2015	Review and edits, Sarah's reply in support of motion to amend complaint	Lapointe	0.6	\$375.00	\$225.00
10/16/2015	Wrote e-mail to Sarah and Jim re Cherie's email about discovery disputes	Lapointe	0.1	\$375.00	\$37.50
10/16/2015	Reviewed e-mail from Cherie Blackburn re continued discovery disputes	Lapointe	0.1	\$375.00	\$37.50
10/19/2015	Meet with current and potential clients to discuss status of lawsuit	Lapointe	3.3	\$375.00	\$1,237.50
10/19/2015	Travel from Atlanta to Charleston to meet with clients	Lapointe	5.33	\$375.00	\$1,998.75
10/20/2015	Debrief call with Sarah and Jim following discovery call with Cherie	Lapointe	0.3	\$375.00	\$112.50
10/20/2015	Call with Jim and Sarah to prepare for Cherie Blackburn call	Lapointe	0.1	\$375.00	\$37.50

Date	Description	Staff	Dir/Off	Proposed Rate	Amount	Notes
10/27/2015	Phone call with Cherie Blackburn, Sarah and Jim re ongoing discovery issues	Lapointe	0.8	\$375.00	\$300.00	
10/29/2015	Meet with clients Elvis Motie and Archie McKella to discuss status of lawsuit	Lapointe	1	\$375.00	\$375.00	
10/29/2015	Return travel from Charlotte after meeting with clients	Lapointe	5	\$375.00	\$1,875.00	
10/21/2015	Various emails with SPLC team re scheduling depositions of clients	Lapointe	0.2	\$375.00	\$75.00	
10/22/2015	Call with Kathy Rhoden at SCANA/SCCE&G re subpoena response and requested Excel spreadsheets	Lapointe	0.2	\$375.00	\$75.00	
10/22/2015	Respond to email from Cerdian counsel re subpoena	Lapointe	0.1	\$375.00	\$37.50	
11/17/2015	Meeting with Sarah, Jim, Carmen to discuss deposition scheduling and next steps in litigation	Lapointe	1	\$375.00	\$375.00	
11/18/2015	Discussion with Sarah and Jim to discuss revised deposition plan, extending discovery, likely SJ motion from defendant	Lapointe	0.5	\$375.00	\$187.50	
11/18/2015	Discussion with Sarah re staffing depositions in Jamaica and Miami	Lapointe	0.2	\$375.00	\$75.00	
11/19/2015	Review and edit joint motion to extend discovery deadline and proposed order	Lapointe	0.2	\$375.00	\$75.00	
12/4/2015	Discuss with Sarah Rich depositions in Montego Bay and plans for Kiawah HR depositions	Lapointe	0.4	\$375.00	\$150.00	
12/5/2015	Prepared for depositions of Beverly Wall and Jacky Regan	Lapointe	2.2	\$375.00	\$825.00	
12/7/2015	Drafting deposition notice for Jessie Simpson	Lapointe	0.2	\$375.00	\$75.00	
12/7/2015	Talk with Jim Kuepp re Kiawah depositions and production of payroll docs	Lapointe	0.2	\$375.00	\$75.00	
12/7/2015	Email Carmen Martinez re court reporter for deposition	Lapointe	0.1	\$375.00	\$37.50	
12/7/2015	Email Cherie Blackburn re depositions of Kiawah HR personnel Dec. 14 and 15	Lapointe	0	\$375.00	\$0.00	
12/7/2015	Talk with Denise LeClerc re depositions of Kiawah HR personnel	Lapointe	0.1	\$375.00	\$37.50	
12/7/2015	Talk with Sarah R. re details of Kiawah HR personnel Dec. 14 and 15	Lapointe	0.1	\$375.00	\$37.50	
12/8/2015	Email Cerdian Counsel Gary Hansen re subpoena	Lapointe	0.1	\$375.00	\$37.50	
12/8/2015	Meeting with Sarah and Jim re upcoming depositions of HR personnel, documents, and expert report	Lapointe	1.1	\$375.00	\$412.50	
12/10/2015	Prepared for deposition of Beverly Wall	Lapointe	0.8	\$375.00	\$300.00	
12/13/2015	Travel from Atlanta to Charleston for Regan, Wall, Simpson depts	Lapointe	5.5	\$375.00	\$2,062.50	
12/13/2015	Prepared for Jacky Regan deposition	Lapointe	0.6	\$375.00	\$225.00	
12/13/2015	Prep for B. Wall deposition	Lapointe	1.8	\$375.00	\$675.00	
12/14/2015	Prepared for deposition of Jackie Regan	Lapointe	1.67	\$375.00	\$626.25	
12/14/2015	Travel from Neesen Pruet office to hotel following Monday depositions	Lapointe	0.3	\$375.00	\$112.50	
12/14/2015	Took deposition of B. Wall	Lapointe	2	\$375.00	\$750.00	
12/14/2015	Discussion with co-counsel of mediators and upcoming depositions	Lapointe	0.3	\$375.00	\$112.50	
12/14/2015	Travel from hotel to Neesen Pruet office for deposition of J. Simpson and B. Wall	Lapointe	0.3	\$375.00	\$112.50	
12/14/2015	Prep for B. Wall dep.	Lapointe	1.5	\$375.00	\$562.50	
12/15/2015	Travel from Charleston to Atlanta following depositions	Lapointe	5	\$375.00	\$1,875.00	
12/15/2015	Took deposition for J. Regan dep from hotel	Lapointe	0.3	\$375.00	\$112.50	
12/15/2015	Took deposition of J. Regan	Lapointe	4.5	\$375.00	\$1,687.50	
12/15/2015	Prepared for deposition of Jackie Regan	Lapointe	2.4	\$375.00	\$900.00	
12/16/2015	Call with opposing counsel re payroll issue and scheduling depositions, mediation	Lapointe	0.9	\$375.00	\$337.50	
12/16/2015	Debrief with co-counsel re depositions of HR personnel	Lapointe	0.4	\$375.00	\$150.00	
12/18/2015	Call with Sarah and Jim debriefing after discovery call with opposing counsel	Lapointe	0.3	\$375.00	\$112.50	
12/29/2015	Emails with Carmen re serving subpoena to defendant's expert	Lapointe	0.2	\$375.00	\$75.00	
12/30/2015	Finalize subpoena to Perry Woodside for Carmen to send for service	Lapointe	0.2	\$375.00	\$75.00	
12/31/2015	Call with Jim and C. Blackburn to discuss production of payroll, calculation of damages, mediation, supplementing discovery responses related to week	Lapointe	0.7	\$375.00	\$262.50	
1/5/2016	Emails to Sarah and Jim re privilege log served by defendant	Lapointe	0.2	\$375.00	\$75.00	
1/6/2016	Research into applicability of work product privilege for communications between employees of defendant	Lapointe	1.62	\$375.00	\$607.50	
1/6/2016	Meeting with Jim and Sarah re comms with R. 23 class members, def's priv log, other discovery issues and mediation	Lapointe	2	\$375.00	\$750.00	
1/7/2016	Research propriety of defendants' communications with class members	Lapointe	0.8	\$375.00	\$300.00	
1/7/2016	Discussion with Jim and Sarah about damages	Lapointe	2.08	\$375.00	\$750.00	
1/8/2016	Call with Cherie Blackburn re privilege log	Lapointe	0.5	\$375.00	\$187.50	
1/8/2016	Research on applicability of tip credit	Lapointe	0.5	\$375.00	\$187.50	
1/8/2016	Review cases on attorneys' fees in D. S.C. from SB 20 case for purposes of mediation	Lapointe	0.4	\$375.00	\$150.00	
1/8/2016	Draft letter to C. Blackburn re Kiawah's communications with class members	Lapointe	1.7	\$375.00	\$637.50	
1/8/2016	Exits to confidential mediation statement	Lapointe	0.5	\$375.00	\$187.50	
1/8/2016	Call with Cherie Blackburn re privilege log	Lapointe	5.5	\$375.00	\$2,062.50	
1/10/2016	Travel from Atlanta to Charleston	Lapointe	0.6	\$375.00	\$225.00	
1/11/2016	Research on applicability of tip credit	Lapointe	0.3	\$375.00	\$112.50	
1/11/2016	Travel time from hotel to Neesen Pruet office for Bjork deposition	Lapointe	0.2	\$375.00	\$75.00	
1/11/2016	Research on 29 USC 203(m) and what can be included in reasonable costs	Lapointe	0.2	\$375.00	\$75.00	

Date	Description	Staff	Duration	Proposed Rate	Amount	Notes
1/1/2016	Research on tip credit	Lapointe	0.4	\$375.00	\$150.00	
1/12/2016	Research on tip credit and emails with Jim, Sarah re same	Lapointe	1.48	\$375.00	\$555.00	
1/12/2016	Reviewed documents in preparation for J. Bozard deposition	Lapointe	3.6	\$375.00	\$1,350.00	
1/12/2016	Research on 29 USC 203(m) and reasonable costs	Lapointe	0.3	\$375.00	\$112.50	
1/13/2016	Travel from Charleston to Atlanta following mediation	Lapointe	5.5	\$375.00	\$2,062.50	
1/13/2016	Travel time to mediation	Lapointe	0.4	\$375.00	\$150.00	
1/13/2016	Participated in mediation	Lapointe	8.5	\$375.00	\$3,187.50	
1/14/2016	Meeting with JK, SR to discuss continued settlement discussions, plan for	Lapointe	0.5	\$375.00	\$187.50	
1/14/2016	Emails with Carmen and Sarah re Desmond Ellis deposition	Lapointe	0.2	\$375.00	\$75.00	
1/15/2016	Prepare for J. Bozard deposition- document review	Lapointe	0.5	\$375.00	\$187.50	
1/15/2016	Discussions with JK, SR re deposition of J. Bozard, Klavath pay practices for tipped employees	Lapointe	0.4	\$375.00	\$150.00	
1/16/2016	Prepare for J. Bozard deposition - document review	Lapointe	2.92	\$375.00	\$1,095.00	
1/16/2016	Prepare for J. Bozard deposition - document review	Lapointe	1.5	\$375.00	\$562.50	
1/17/2016	Prepare for Jennifer Bozard deposition- document review	Lapointe	4.23	\$375.00	\$1,586.25	
1/17/2016	Prepare for J. Bozard deposition- document review	Lapointe	4.3	\$375.00	\$1,612.50	
1/17/2016	Prepare for Jennifer Bozard deposition - document review	Lapointe	3.5	\$375.00	\$1,312.50	
1/18/2016	Travel from Atlanta to Charleston for J. Bozard deposition	Lapointe	4.2	\$375.00	\$1,575.00	
1/18/2016	Prepare for Jennifer Bozard deposition- document review and outline	Lapointe	4.3	\$375.00	\$1,612.50	
1/19/2016	Take Jennifer Bozard deposition	Lapointe	8	\$375.00	\$3,000.00	
1/19/2016	Travel time from hotel to Nexusen Pruett for J. Bozard deposition	Lapointe	0.3	\$375.00	\$112.50	
1/19/2016	Final preparation for Jennifer Bozard deposition	Lapointe	1.2	\$375.00	\$450.00	
1/20/2016	Travel from Charleston to Atlanta following J. Bozard deposition	Lapointe	5.5	\$375.00	\$2,062.50	
1/20/2016	Consult with Jim and Sarah re: settlement and tip credit damages	Lapointe	0.3	\$375.00	\$112.50	
1/21/2016	Discussion with Sarah and Jim on tip credit and SCPWA	Lapointe	0.2	\$375.00	\$75.00	
1/21/2016	Reviewed D.S.C. case on tip credit under SCPWA	Lapointe	0.2	\$375.00	\$75.00	
1/21/2016	Further discussion with Jim re: tip credit and amending complaint	Lapointe	0.2	\$375.00	\$75.00	
1/22/2016	Prepare for J. Bozard deposition- onlining and document review	Lapointe	3.5	\$375.00	\$1,312.50	
1/22/2016	Discussion with Jim Knoepf and Dan Werner re tip credit	Lapointe	0.6	\$375.00	\$225.00	
1/22/2016	Travel to Miami for FL ECTS, Hobis, and D. Ellis depositions	Lapointe	5.5	\$375.00	\$2,062.50	
1/23/2016	Emails with Jim Knoepf re Desmond Ellis deposition prep	Lapointe	0.2	\$375.00	\$75.00	
1/27/2016	Prep for D. Ellis deposition -- review documents on Xera	Lapointe	1.3	\$375.00	\$487.50	
1/27/2016	Various emails with Carmen Martinez re D. Ellis travel plans for deposition	Lapointe	0.3	\$375.00	\$112.50	
1/27/2016	Meet with Jim and Sarah to discuss 30(b)(6) deposition topics	Lapointe	0.5	\$375.00	\$187.50	
1/28/2016	Prepped client Desmond Ellis for deposition (with SR)	Lapointe	2	\$375.00	\$750.00	
1/29/2016	Return travel from Miami to Atlanta following D. Ellis deposition	Lapointe	5.5	\$375.00	\$2,062.50	
2/3/2016	Meeting with Sarah, Jim, and Carmen to plan for summary judgment filing	Lapointe	1	\$375.00	\$375.00	
2/3/2016	Gather documents to file second amended complaint; emails with co-counsel re same	Lapointe	0.3	\$375.00	\$112.50	
2/4/2016	Research and drafting of motion for protective order re immigration status	Lapointe	1.5	\$375.00	\$562.50	
2/4/2016	Research into immigration status inquiries in wage cases; assertion of 5A privilege; protective orders	Lapointe	1	\$375.00	\$375.00	
2/4/2016	Emails with co-counsel re local rules on assertion of privilege at deposition and need to file motion for protective order	Lapointe	0.2	\$375.00	\$75.00	
2/4/2016	Draft motion to extend deadline to file motion for protective order re Ellis dep	Lapointe	0.5	\$375.00	\$187.50	
2/8/2016	Review and code J. Regan (Carter) dep for SJ	Lapointe	1.8	\$375.00	\$675.00	
2/8/2016	Review and code B. Wall deposition for SJ	Lapointe	0.8	\$375.00	\$300.00	
2/9/2016	Review motions submitted in case involving SCPWA and tips; email Jim and Sarah re same	Lapointe	0.2	\$375.00	\$75.00	
2/9/2016	Call with court reporting service re returning Tibbets deposition transcript (original) at request of defendant for confidential designations	Lapointe	0.1	\$375.00	\$37.50	
2/9/2016	Emails with Carmen re Tibbets transcript and returning it at request of defendants	Lapointe	0.2	\$375.00	\$75.00	
2/9/2016	Review and code J. Bozard dep. for SJ filing	Lapointe	1.6	\$375.00	\$600.00	
2/11/2016	Discussion with Jim, Sarah re settlement	Lapointe	0.2	\$375.00	\$75.00	
2/11/2016	Complete review and coding of Jennifer Bozard deposition for MSJ	Lapointe	1.3	\$375.00	\$487.50	
2/18/2016	Prepare joint motion for entry of protective order re Desmond Ellis deposition and proposed order	Lapointe	0.6	\$375.00	\$225.00	
2/18/2016	Research for opposition to motion to extend opt-out period	Lapointe	1.3	\$375.00	\$487.50	
2/18/2016	Review and code deposition of Desmond Ellis	Lapointe	0.5	\$375.00	\$187.50	
2/19/2016	Draft opposition to motion to extend opt-out period	Lapointe	2.1	\$375.00	\$787.50	
2/19/2016	Additional revisions to motion for protective order and propose order following call with Cherie Blackburn	Lapointe	0.2	\$375.00	\$75.00	
2/19/2016	Call with Cherie Blackburn re motion for protective order	Lapointe	0.2	\$375.00	\$75.00	
2/21/2016	Drafted opposition to motion to extend opt-out period	Lapointe	1.42	\$375.00	\$532.50	
2/22/2016	Drafting opposition to motion to extend opt-out period	Lapointe	2.1	\$375.00	\$787.50	

Date	Description	Staff	Dir Qty	Proposed Rate	Amount	Notes
2/23/2016	Discuss second round of mediation with Jim and Sarah	Lapointe	0.2	\$375.00	\$75.00	
2/24/2016	Incorporate edits; finalize opposition to motion to extend opt-out period, including exhibit, send to local counsel for filing	Lapointe	2.1	\$375.00	\$787.50	
2/25/2016	Research on willfulness for summary judgment	Lapointe	.2	\$375.00	\$750.00	
2/29/2016	Drafting willfulness section of MSJ	Lapointe	1.33	\$375.00	\$498.75	
2/29/2016	Drafting sections on willfulness for SJ motion	Lapointe	5.5	\$375.00	\$2,062.50	